

Submission of the

AMERICAN LIBRARY ASSOCIATION

to the

U.S. DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration

and the

U.S. DEPARTMENT OF AGRICULTURE
Rural Utilities Service

Comments Regarding
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American Recovery and Reinvestment Act of 2009
Broadband Initiatives
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EXECUTIVE SUMMARY

There are over 100,000 libraries (including 16,543 public library outlets) in communities across the nation. Each of these plays a vital role in supporting job searches and career development, small business creation and development, school homework and research, and access to online education, training, and E-government resources through their free public access terminals. Broadband connections are one of the critical elements that allow libraries to provide these essential services to the public.

Target Funding for High-speed Broadband to Libraries

NTIA and the RUS should target funding for high-speed broadband connections to libraries and develop grant criteria in a way that reflects the critical role libraries play in providing no-fee access to the internet. ALA believes that fiber optic cable will be the best long-term solution for high-speed broadband deployment for most libraries and urges NTIA and the RUS to target a significant amount of funding for a program to bring fiber to the nation's public libraries – though excepting some states or regions for which fiber solutions would be cost-prohibitive. These fiber projects should be primarily funded through the *Building broadband facilities* funding area, though some of these projects might be funded through the funds allocated for *Expanding public computing center capacity*, especially requests for smaller amounts for library projects that address multiple purposes.

Libraries as Community Anchor Institutions

Public libraries can serve as “community anchor institutions” for a robust nationwide fiber network. Funding for “fiber to the library” is a cost-effective solution that will offer almost unlimited capacity for decades and is often less expensive to operate on an ongoing basis than other technologies. Key community service organizations such as libraries should have a definition of broadband that addresses the unique needs of libraries and the role libraries play for their particular communities, rather than a definition based on a fixed number of megabits per second. In any event, areas that do not meet the agency's definition of unserved and underserved based on residential broadband availability should not disqualify a key community service organization such as a library. Private sector applicants should be encouraged and rewarded for efforts to include libraries and other entities mentioned in 6001(b)(3) in their investment plans.

Needs Beyond Bandwidth

However, improving libraries' broadband capabilities involves more than a bigger pipe to library buildings. The technical and physical infrastructure within libraries often needs to be upgraded to accommodate faster internet connections and improve wireless service in and around libraries. These improvements include hardware (e.g., routers and servers), software, inside wiring, and building renovations. Additional expertise also may be needed, such as technical advice and support and capacity and sustainability planning. These investments all enhance access and support for broadband services. ARRA funding should provide support for these costs.

Libraries and the Grant-making Process

Most libraries have significant financial need. The 20% match will be a major challenge for most libraries, given the severe economic downturn. Libraries should be accorded accommodations to the match requirement.

State priorities deserve some deference but there are also other important priorities. NTIA should allow funding for multi-state applications, some in-state applications exclusive of a state's strategy, and national-level applications (e.g., assessment, research, and aggregated services).

Include Libraries in Broadband Mapping

The broadband map should not be limited only to residential customer information. The map should include key community service organizations such as the more than 16,000 public library outlets in the United States. To the extent that it is practical, we ask for as much data collection about libraries' current broadband service as possible. The results should be broadly available to the public, since these efforts are being supported by taxpayer dollars.

INTRODUCTION

The American Library Association (ALA), the world's oldest and largest professional association for the U.S. library community – representing over 67,000 members – is pleased to provide comments on this joint request for information on the broadband initiatives of the American Recovery and Reinvestment Act of 2009 (ARRA). There are over 100,000 libraries (including 16,543 public library outlets) in communities across the nation. Each of these plays a vital role in supporting job searches and career development, small business creation and development, school homework and research, provision of access to online education, training, and E-government resources through their free public access terminals. Broadband connections are one of the critical elements that allow libraries to provide these essential services to the public. With the right implementation, the ARRA has the potential to benefit millions of people by funding high-capacity, “future-proof” connections to the Internet in large aggregation points such as libraries.

At the outset, ALA commends NTIA officials for correctly suggesting that the ARRA establishes four separate funding areas:

1. Expanding public computing center capacity;
2. Stimulating broadband adoption;
3. Mapping; and
4. Building broadband facilities.

These four funding areas will be discussed in the comments below. As explained further below, libraries can help achieve the objectives of all four of these funding areas. Libraries should be eligible to participate in, and receive funding from, each of the four areas.

Considering the critical role that libraries play in providing no-fee access to the internet and the burgeoning demand for the internet access provided by libraries,¹ we urge the agency to target funding for high-speed broadband connections to libraries and to develop grant criteria that reflect this. While ALA realizes that there is a variety of available broadband technologies, we believe that fiber optic cable will be the best long-term solution for high-speed broadband deployment for most libraries.² Thus, ALA strongly supports targeting a significant amount of funding for a program to bring fiber to the nation's public libraries – though excepting some states or regions for which fiber solutions would be cost-prohibitive. These fiber projects should be primarily funded through the *Building broadband facilities* funding area, though some of these projects might be funded through the funds allocated for *Expanding public computing center capacity*, especially requests for smaller amounts for library projects that address multiple purposes.

¹ "It Has Computers, Gives Advice and Is Free," by Joshua Brustein, *New York Times*, March 26, 2009, available at <http://www.nytimes.com/2009/03/26/nyregion/26libraries.html?scp=5&sq=libraries&st=cse>.

"Business Brisk at Area Libraries: In Bad Times, Free Resources Are a Hot Commodity," by Annie Gowen, *Washington Post*, February 2, 2009, available at <http://www.washingtonpost.com/wp-dyn/content/article/2009/02/01/AR2009020102331.html?sid=ST2009020200539>.

² There are exceptions, such as remote areas in Alaska, where fiber may well not be the best solution. In these areas, funding should be directed to other technologies that provide the most effective solution.

NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION (NTIA)

1. THE PURPOSES OF THE GRANT PROGRAM

a. Some grant funds should be apportioned to each purpose.

A large proportion of the funds under *Building broadband facilities* should be set aside for libraries and the other institutions and organizations listed under Section 6001(b)(3) of the Act to carry out projects that further the program goals in this section. In fact, ALA submits that providing funding for high-speed broadband connections to these institutions and organizations will have the maximum “bang for the buck” because they serve as aggregation points for large numbers of Americans. In addition, libraries and the other institutions and organizations should be eligible to apply directly for funding to provide education, awareness and training programs, as well as apply for the necessary associated equipment. Non-library applicants should also be awarded scoring points when they include infrastructure used to provide high-capacity bandwidth to libraries.

The minimum data rates for broadband necessary to serve key community service organizations such as libraries should be established irrespective of the definitions of the terms “unserved” and “underserved” that apply to residential consumer broadband. In other words, key community service organizations such as libraries should be eligible under Section 6001(3) based on the unique needs and broadband availability for libraries and not excluded from eligibility in areas that have been determined as ineligible under the residential determination of unserved and underserved.

b. The government should be agnostic whether or not more than one purpose is addressed in an application.

We believe that the government should not have an a priori preference for how many purposes are addressed in an application. Successful submissions should be determined by the vision and competencies of the applicants and how the submission advances the goals of the ARRA. Some projects are inherently quite narrow, some are broad, and others are in between. Each could be very necessary to serve a particular community.

c. Generally, strong coordination across other programs is not realistic, but BTOP will mesh effectively with the existing E-rate program.

Attempting to require or encourage Broadband Technology Opportunities Program (BTOP) applicants to coordinate their applications with applications to other federal programs (such as RUS) will lead to a huge administrative burden, confusion, and delay for the applicant as well as a cumbersome review process for NTIA. The focus should be on creating a streamlined BTOP application process and fast and efficient reviewer criteria to expedite awards to help combat the severe economic recession.

However, we do recognize that the government has the responsibility to prevent unjust enrichment and some coordination will be necessary. For example, we anticipate that the BTOP will work in concert with the existing federal E-rate program. The E-rate program has been essential in providing support for recurring costs; however, the E-rate program rules expressly state that “to the extent that states, schools, or libraries, build or purchase a wide area network to provide telecommunications services, the cost of such wide area network shall not be eligible for universal service discounts...”

The awarding of grants through the BTOP to construct and deploy infrastructure in an area is the critical non-recurring cost component that is so essential to providing the necessary capacity to such community anchor institutions as libraries and schools and which is not eligible for support under the E-rate program. In addition, given that BTOP grants will pay for the construction of such infrastructure, we expect that the recurring costs for services in these areas will be limited to the cost of maintaining services. Therefore, the schools and libraries mechanism of the Universal Service Fund will be further extended to assist these critical community anchor institutions in being able to sustain the recurring costs for the capacities they need to finally make these critical resources available and affordable.

Building technical capacity is not the only key to successful broadband deployment. According to E-rate rules, E-rate discounts are not available for staff training or software; while this is perfectly reasonable given the intent of that legislation, a well-trained staff that is prepared to assist library users on properly-equipped computers is also important. BTOP's funding available for the stimulation of broadband adoption will help to fill this gap; E-rate and BTOP will each make the other stronger.

While care should be given that every BTOP and E-rate dollar is spent wisely, it is not "double dipping" or "unjust enrichment" for schools, libraries, and rural health care facilities to participate both in the E-rate program and benefit from BTOP grants since they do not fund the same things. It is the exact opposite. Such dual program participation for multiple elements of the broadband equation multiplies the economic, social and education impact of each program. Synergy between these programs should be positively encouraged.

2. THE ROLE OF THE STATES

a. State priorities deserve some deference, but there are other important priorities as well.

For some portion of the available funding, state priorities should be given consideration. In a number of instances, the states will have coordinated their needs with in-state stakeholders and developed a statewide strategy.

However, optimal high-speed broadband solutions do not necessarily stop at a state's borders. NTIA should allow for the funding of some multi-state applications. Also, there should also be some allowance for entities within a state to obtain grant funding exclusive of the state's strategy. Given the compressed timescale for applications, there may be meritorious applicants who are not included in statewide strategies for various reasons.

While states have an important role to play, NTIA needs to make some allowance for national-level applications, which could include activities related to overall assessment of library broadband investments, research, and aggregated services.

b. States should provide their high-speed broadband strategies and priorities to NTIA.

States should provide general guidance and overall priorities to NTIA. The states should not make funding recommendations at the grant application level. NTIA, through its agents such as grant review committees, will need to make decisions based on the national interest. States' priorities are a critical component of the national interest, but there are also other priorities as articulated above.

c. & d. No comments

3. ELIGIBLE GRANT RECIPIENTS

In most cases, libraries are dependent on telecommunications companies to provide broadband service, but libraries often have difficulty obtaining the upgraded broadband capacity that they need. Thus, ALA believes that it would be in the public interest to make private sector telecommunications companies eligible for grants. However, we urge NTIA to require private sector companies to specifically address the needs of community service organizations like libraries in their grant proposals.

Private sector applicants should be encouraged and rewarded for efforts to include libraries and other entities mentioned in 6001(b)(3) in their investment plans. The more significant the commitment, the more points such a project should receive.

A for-profit telecommunications service vendor that is building out new high-speed broadband capability to households in a community should be required to provide comparable or better access to key community service organizations in that community such as public libraries. For example, a fiber-capacity to the library deployment as part of a larger application should be able to meet this requirement.

4. ESTABLISHING SELECTION CRITERIA

a. Selection criteria should reflect this historic opportunity.

From the perspective of the library community, the funding under the control of NTIA is monumental. Within the goals of the program, ALA urges NTIA to fund some truly visionary and strategic projects that might not have another opportunity to be funded in the foreseeable future. For the library community, our major vision is the “fiber-capacity to the library” initiative, which would link most public libraries at very high speeds.

At the same time, many important projects that are not as ambitious should also be funded. We are only making the point that, considering the scale of funds available, the projects that are funded should go well beyond “more of the same.” Additionally, as we discussed above in the role of the states, selection criteria should accommodate state priorities, but support national interests and facilitate multi-state projects, which create jobs, save jobs, create infrastructure and spur broadband adoption and use consistent with the ARRA.

ALA opposes giving priority to projects that leverage other ARRA projects, address several purposes or serve several populations because such preferences will be valid in some instances and not in others. For example, is it inherently superior to serve 20,000 people in each of two of the identified populations versus 40,000 people in one of the identified populations? Not really. In a specific case, it can be superior, inferior, or indifferent.

b. No comments

c. “Unserved” and “underserved” have different meanings for libraries and other key community service organizations than for residential users.

Key community service organizations such as libraries should have a definition of broadband that addresses the unique needs of libraries and the role libraries play for their particular communities, rather than a definition based on a fixed number of megabits per second. In any event, areas that do not meet the agency's definition of unserved and underserved based on residential broadband availability should not disqualify a key community service organization such as a library.

d and e. No priority should be given for any of these factors.

ALA opposes priority for these factors because such preferences will be valid in some instances and not in others. For example, is it inherently superior to serve 20,000 people in each of two of the identified populations versus 40,000 people in one of the identified populations? Not really. In a specific case, it can be superior, inferior, or indifferent.

f. Libraries are uniquely positioned to sustain ARRA broadband investments.

Libraries enjoy several competitive advantages with respect to the financial sustainability of completed ARRA high-speed broadband projects. One important source of ongoing funding for telecommunications services – the federal E-rate program – has been discussed above. In addition, the library community has created collaborative organizations that organize and sustain networks at the multi-state, state or regional level, which provides an important infrastructure and knowledge base to help sustain ARRA projects. These organizations, for example, enable libraries to engage in economies of scale and scope in their procurement and support of telecommunications services. Many of these collaborative organizations have existed for decades.

There is also an inherent sustainability of libraries. As key community service organizations, whether as public libraries, school or academic libraries, or otherwise, we expect libraries to exist indefinitely. Broadband needs are only expected to increase in magnitude and importance; as library connectivity has increased over the last decade, so has the use of the public library. Thus, funding for ongoing high-speed broadband services is a high priority for libraries, once the underlying technical infrastructure is in place. On a practical and political note, local or state governments, or college or school administrations are likely to submit library proposals only for projects for which they believe financial sustainability is highly probable.

As key community service organizations, libraries are well-positioned to promote the continuing adoption of broadband services. Community residents can use library services to learn about the value of high-speed broadband and the merits of obtaining such broadband service at home. Libraries can also provide outreach services and training classes on obtaining relevant and credible information on the Internet to help stimulate consumer demand for broadband services.

g. Technologies that are most appropriate to a given need should be employed.

When considering the question of technological neutrality, we believe that the agency should avoid establishing definitions for *eligibility*, *minimum broadband speeds*, *unserved*, and *underserved* that would prevent any public institution from using the technology that is best able to serve the long-term needs of that institution. Furthermore, the agency must remain mindful that different technologies may provide very distinct broadband service and therefore should not be considered duplicative. For example, the presence of a mobile broadband service meeting the minimum broadband performance required under the BTOP program should not preclude consideration of a BTOP grant application for fixed broadband service in a particular area and vice versa. Mobile broadband and fixed broadband services are distinct services and will address different needs in a given community.

h. Available but expensive high-speed broadband does not constitute access.

All applications for grants should propose affordable service to end users, whether libraries or otherwise. The agency should not impose a hard and fast rule, but take into consideration various factors affecting the market for which the project is proposed. No one factor should establish the agency's definition of affordability. The agency should take into consideration the full complement of factors – including, but not limited to, the cost of providing service and income or poverty factors. The program should recognize the commonsense fact that a project which subscribers can afford is better than a project which subscribers cannot afford.

5. GRANT MECHANICS

a. Agencies should encourage aggregated applicants and selected re-granting.

Individual applications from the nation's more than 16,000 public library outlets would entail a substantial burden for the library community, in terms of the time and expertise needed, particularly for smaller and less-affluent libraries. Applicants could be aggregated through regional library cooperatives, state libraries, or otherwise. In fact, many libraries already are members of a larger organization that could act on their behalf.

NTIA should also permit re-granting or sub-contracting that is consistent with the purposes of the program and the oversight and accountability of the program. In the timeframe for applications, some smaller libraries, often in rural areas, may find it too difficult to be included in aggregated applications. A larger entity with appropriate standing in the region, state, or nationally could receive a grant and make small grants to these libraries.

b. Grants for aggregated applicants and re-granting can increase the return to communities and simplify the grant-making process for the government.

Aggregated grants enjoy the benefits of economies of scale in the procurement of services, thereby improving the total return on the federal dollar. Further, aggregated grants will likely be of higher quality and will include a central entity responsible for administering the grant funds and fulfilling grant-related deadlines. Finally, this approach can leverage the existing organizational infrastructure that entities like state library agencies have for receiving and distributing federal funds (e.g., funding received through the Library Services and Technology Act (LSTA)).

Many smaller libraries could have needs that are modest relative to this program. The adoption of some re-granting (sub-contracting) would relieve NTIA of the potentially large number of applications for modest grants (e.g., individual grants each in the tens of thousands of dollars).

Additional Comment: NTIA should solicit broad participation in the review of grant applications

ALA encourages NTIA to include practitioners, policy analysts, and academics from the library community in the review process for grant applications. We believe that this will help to ensure that those applications from the library community that are most meritorious from a library perspective receive funding. It also will encourage the success of meritorious applications from outside of the library community that include essential support to the library community. This will help ensure that the goals of President Obama and Congress are achieved.

6. GRANTS FOR EXPANDING PUBLIC COMPUTER CENTER CAPACITY

a. Selection criteria should prioritize high-speed broadband to libraries and the factors essential to its successful implementation.

Helping libraries get access to the high-capacity fiber networks they need today and in the future is key to the success of the overall ARRA program. Since libraries serve as information hubs for their communities, inclusion of libraries in the larger, general build-out of the broadband infrastructure will contribute towards more cohesive and efficient network infrastructure for America's communities and help ensure that high-speed broadband will reach the greatest percentage of the population. In other words, public libraries can serve as "community anchor institutions" for a robust nationwide fiber network. Funding for "fiber to the library" is a cost-effective solution that will offer almost unlimited capacity for decades and is often less expensive to operate on an ongoing basis than other technologies.

However, improving libraries' broadband capabilities involves more than a bigger pipe to library buildings. The technical and physical infrastructure within libraries often needs to be upgraded to accommodate faster internet connections and improve wireless service in and around libraries. These improvements include hardware (e.g., routers and servers), software, inside wiring, and building renovations. Additional expertise also may be needed, such as technical advice and support and capacity and sustainability planning. These investments all enhance access and support for broadband services. ARRA funding should provide support for these costs.

b. Libraries are the premier public computer centers.

The ARRA recognizes the key role that libraries play in providing public access to the internet and all the opportunities it provides. Libraries are the premier public computing centers in America's communities, providing access to online education, job searching and skills training, government services and more. Nearly 100% of public libraries and community college libraries provide public access to the Internet at no charge to their users, and in 73% of communities, they are the only source of no-fee public Internet access. This number rises to 82% in rural areas.³ Use of libraries has heavily increased across the country in these difficult economic times.

7. GRANTS FOR INNOVATIVE PROGRAMS TO ENCOURAGE SUSTAINABLE ADOPTION OF BROADBAND SERVICE

a. Established community institutions are best positioned to make an impact quickly.

NTIA should prioritize awards under this program to established institutions such as public libraries that have demonstrated a track record of serving their communities. Librarians work with community residents every day as they develop the skills necessary to succeed in an online environment. Communities of information-literate people are communities that place a priority on sustaining access to broadband networks. In this way, libraries serve as not only technical broadband hubs, but also information hubs within the community.

The selection criteria should be designed so that funding is available for many facets of projects, including training, software, and public outreach, as well as equipment and facilities.

³ (2008). *Libraries Connect Communities: Public Library Funding & Technology Access Study 2007-2008*. Chicago: American Library Association.

b. No comments

8. BROADBAND MAPPING

a. The map should improve planning for high-speed broadband projects.

The broadband map should assist libraries and their communities with planning for new broadband projects. Also, insofar as comparable pricing information is available, the data associated with the map will facilitate improved price negotiations with telecommunications vendors, helping to overcome information asymmetry in the marketplace and therefore lead to a more competitive market.

The agency should make it a requirement for any grant for broadband mapping that an assessment of key community service organizations be included in any broadband map for a given state or area. Also, the data and results from mapping efforts should be fully available to the general public in an easily accessible way, as they are being completed through taxpayer dollars.

b, c, & d. Include public libraries as entities in the map.

The broadband map should not be limited only to residential customer information. The map should include key community service organizations such as the more than 16,000 public library outlets in the United States. To the extent that it is practical, we ask for as much data collection about libraries' current broadband service as possible.

e, g, h, & i. No comments

f. Collect data needed for public libraries.

States should include an assessment of every public library, including whether or not the library has access to broadband service. Further, the assessment should be sensitive to multiple factors, including, but not limited to, affordability and sufficient data rates that are necessary to meet the particular needs of a given library.

9. FINANCIAL CONTRIBUTIONS BY GRANT APPLICANTS

a. Most libraries have significant financial need.

Libraries are under particular strain in the current economic climate. While budgets are falling precipitously, use of the library is up dramatically in libraries across the country. Libraries currently are straining to maintain current levels of support, so a requirement for matching funds will present a real and staggering burden to libraries across the country. Thus, the 20% match specified by the Recovery Act will be a major challenge.

ALA urges NTIA to implement rules to ease the burden on libraries; most libraries desperately need this new investment in high-speed broadband, but find themselves in a remarkably poor position to fund new projects, even at the 20% level. Of course, an exemption to the 20% match would be ideal. If public libraries cannot be exempted from the matching provision, then we ask NTIA to develop a simple and streamlined process to apply for a partial or full waiver to the match to establish financial need. NTIA also should interpret the matching provision as broadly as possible to include grants from private foundations or in-kind contributions.

b & c. No comments

QUESTIONS 10-12. No comments

13. DEFINITIONS

a. “Unserved” and “underserved” have different meanings for libraries and other key community service organizations than for residential users.

The level of broadband (minimum data rates considered for broadband) necessary to serve key community service organizations, such as libraries, should be established irrespective of the definitions of “unserved” or “underserved” with regard to residential consumer broadband. In other words, key community service organizations such as libraries should be eligible under Section 6001(b)(3) based on the unique needs and broadband availability for libraries and not excluded from eligibility in areas that have been determined as ineligible under the residential determination of unserved and underserved.

Key community service organizations such as libraries should have their own definition of broadband that addresses the unique needs of libraries and recognizes the role libraries play for their communities. Areas that do not meet the agency’s definition of unserved and underserved based on residential broadband availability should not disqualify a key community service organization such as a library.

b. Broadband service and transmission speed requirements vary among households and key community service organizations such as libraries.

When the BTOP is considering the definition of “broadband service” it must consider the differences in need between residential users and facilities like libraries that provide public access to the internet. A connection speed that might be sufficient for a home user will be insufficient for a library supporting public access computing and other services that require connectivity. For this reason we encourage BTOP to be as expansive as possible in creating these definitions.

c. Create a basic nondiscrimination and network interconnection requirement.

ALA believes that NTIA should require commercial providers offering service to the public to be subject to a basic and enforceable non-discrimination requirement, but otherwise should not impose any new requirements beyond existing statutory obligations.

d. Public libraries are “community anchor institutions.”

Libraries serve as information hubs for their communities. Inclusion of libraries in the larger, general build-out of the broadband infrastructure will contribute towards more cohesive and efficient network infrastructure for America’s communities and help ensure that high-speed broadband will reach the greatest percentage of the population. In other words, public libraries can serve as “community anchor institutions” for a robust nationwide fiber network.

e. Unaffordable prices mean no access for libraries.

Pricing matters greatly to libraries. Very high prices that libraries cannot afford translate to no access as surely as if there were absolutely no service offered in the first place.

QUESTIONS 14-15. No comments

RURAL UTILITIES SERVICE (RUS)

1. WHAT ARE THE MOST EFFECTIVE WAYS RUS COULD OFFER BROADBAND FUNDS TO ENSURE THAT RURAL RESIDENTS THAT LACK ACCESS TO BROADBAND WILL RECEIVE IT?

The American Library Association (ALA) urges the Rural Utilities Service to recognize the essential role that libraries play in providing broadband access in rural communities by directing some portion of the funds to grants for library applicants. In rural communities across the country, libraries provide access to online resources such as job training, E-government services, educational opportunities and more to those who do not or cannot have access at home. In 73% of the nation's communities, libraries are the only source of free public access to the internet. In rural areas, this number rises to 82%. Further, public libraries serve as anchor tenants in rural communities, creating a market for the build-out of high-speed broadband networks.

ALA urges RUS to support libraries with grants, not loans. Even in good economic times, smaller and poorer libraries are just able to keep the doors open, so obtaining the ongoing financial resources to support loan payments is unlikely. In the current severe economic downturn, most public libraries are facing significant budget cuts. Making new loan payments is not realistic for most libraries; thus, very few libraries are expected to participate in a loan program.

Furthermore, grants can also be awarded more expeditiously than loans, requiring fewer resources and expenditures by the applicants and the agency. Loans involve substantial due diligence in advance of an award as well as strict post-award audits and reporting over the life of the loan, which will generally be much longer than for a grant.⁴

The ARRA only requires that loans and loan guarantees be authorized by the Rural Electrification Act (RE Act). The agency's grant authority is untethered from the RE Act. The title of the RUS section makes it very clear that Congress gave the RUS full authority to use ARRA funds for Distance Learning and Telemedicine (DLT) projects. A portion of the ARRA funds allocated to the RUS should be dedicated to DLT projects which give rural residents access to broadband technologies. In making funds available to DLT projects, RUS should breathe life into the 2008 farm bill provision which make libraries clearly eligible for DLT funding. The DLT program rules should be expanded for the purpose of ARRA funding and appropriated funding to permit library-centric projects which in fact facilitate self directed education and the dissemination of health information should be fully eligible for RUS DLT funding.

In implementing ARRA, the Secretary should look to the role libraries play in facilitating rural economic development and be very clear that enhanced library access to bandwidth also enhances rural economic development. Rural networks providing broadband services to community service organizations like libraries can also be made available to commercial interests who expand the opportunities for rural economic development. Library centric applications for grant funding should be permitted as facilitating rural economic development.

⁴ Adapted from comments filed by the Fiber to the Home Council.

a. Aggregation and re-granting can help to reach these areas.

Individual applications from the nation's thousands of rural libraries would entail a substantial burden for the library community, in terms of the time and expertise needed. Applicants could be aggregated through regional library cooperatives, state libraries, or otherwise. In fact, many libraries are already members of a larger organization that could act on their behalf.

RUS should also permit re-granting or sub-contracting that is consistent with the purposes of the program and the oversight and accountability of the program. In the timeframe for applications, some smaller libraries, often in rural areas, may find it too difficult to be included in aggregated applications. A larger entity with appropriate standing in the region, state, or nationally could receive a grant and make small grants to these libraries.

b. Leveraging can be an appropriate strategy, but not for rural libraries.

Libraries – particularly rural libraries – are under particular strain in the current economic climate. While budgets are falling precipitously, use of the library is dramatically up in libraries across the country. Libraries are straining to continue to provide their current level of support, so requiring funds for private investment is likely to prohibit thousands of libraries from participating in the RUS program, particularly the neediest libraries.

c. No comments

2. IN WHAT WAYS CAN RUS AND NTIA BEST ALIGN THEIR RECOVERY ACT BROADBAND ACTIVITIES TO MAKE THE MOST EFFICIENT AND EFFECTIVE USE OF THE RECOVERY ACT BROADBAND FUNDS?

a. Mobile and fixed land line broadband service are not duplicative.

RUS should not consider mobile broadband service and fixed land line broadband service duplicative for the purpose of ARRA funding.

b. No comments

3. HOW SHOULD RUS EVALUATE WHETHER A PARTICULAR LEVEL OF BROADBAND ACCESS AND SERVICE IS NEEDED TO FACILITATE ECONOMIC DEVELOPMENT?

Considering the critical role that libraries play in providing no-fee access to the internet, we urge RUS to target funding fiber connections to rural libraries and to develop grant criteria that reflect this. While ALA realizes that there are a variety of available broadband technologies, we believe that fiber optic cable will be the best long-term solution for high-speed broadband deployment for most libraries.⁵ Thus, ALA strongly supports targeting a significant amount of funding for a program to bring fiber to the nation's rural libraries – though excepting some states or regions at which fiber solutions would be cost-prohibitive.

⁵ There are exceptions, such as remote areas in Alaska, where fiber may well not be the best solution. In these areas, funding should be directed to other technologies that provide the most effective solution.

a. “Rural economic development” must build on strong community institutions.

Rural economic development should be defined broadly to include the critical community institutions and resources necessary for economic competitiveness, such as libraries, schools, health care facilities, public safety, and more.

b & c. No comments

4. WHAT VALUE SHOULD BE ASSIGNED TO THESE FACTORS IN SELECTING APPLICATIONS? WHAT ADDITIONAL PRIORITIES SHOULD BE CONSIDERED BY RUS?

(1 & 2) No comments

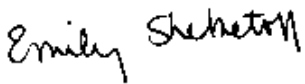
(3) We recommend that RUS funding is determined by merit – those projects that have the most promise to provide rural communities with high-speed broadband should receive priority in funding. Current and former RUS borrowers should not receive preferential treatment.

(4) RUS should not allow entities with large cash reserves to have an advantage with respect to scoring of the application.

5. WHAT BENCHMARKS SHOULD RUS USE TO DETERMINE THE SUCCESS OF ITS RECOVERY ACT BROADBAND ACTIVITIES?

No comments

Respectfully Submitted,

A handwritten signature in black ink that reads "Emily Sheketoff". The signature is written in a cursive, slightly slanted style.

Emily Sheketoff
Executive Director, American Library Association Washington Office